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April 25, 2025

The Honorable Alfred H. Bennett
United States District Judge
Southern District of Texas, Houston Division
Bob Casey United States Courthouse
515 Rusk, Room 8624
Houston, Texas 77002

Re: Civil Action No. 4:21-cv-270, *Clifford F. Tuttle, Jr., et al. v. City of Houston, et al.*; In the United States District Court, Southern District of Texas. Consolidated with: Civil Action No. 4:21-cv-272, *John Nicholas, et al. v. City of Houston, et al.*; In the United States District Court, Southern District of Texas.

Dear Judge Bennett,

Counsel for Gonzales, submits this letter pursuant to the Court's instruction that the parties advise regarding the continued sealing of the summary judgment briefings and exhibits:

- Gonzales does not oppose unsealing Defendant Robert Gonzales' Motion for Summary Judgment (Doc. #312) and its exhibits.
- Gonzales requests that Plaintiffs' Response to Defendant Robert Gonzales' Motion for Summary Judgment (Doc. #332) be partially unsealed. The bullet-point text on pages 6-9 of the motion appear to directly quote large sections of the IAD report[s] and should be redacted.
- Gonzales requests that Plaintiffs' exhibits #32 and #33 remain sealed due to them being the actual IAD investigation reports.
- Gonzales requests that Plaintiffs' exhibits E, H, M, N, O, P, Q, R, Z, and AG remain sealed as they are the City Officers' depositions.

- Gonzales requests that Plaintiffs' exhibit AD remain sealed as it is Commander Nguyen's, the IAD commander, deposition.
- Gonzales requests that Plaintiffs' exhibit G remain sealed as it is Lieutenant French's, the IAD lieutenant, deposition.
- Gonzales requests that Plaintiffs' exhibit 107 remain sealed as it is former Defendant Eric Sepolio's IAD administrative statement.
- Gonzales requests that Plaintiffs' exhibit 7 remain sealed as it is Officer Blankenship-Reeves's IAD statement.
- Gonzales requests that regarding Order (Doc. #438), that material quoting compelled statements to IAD on pages 51-52 be redacted.

Respectfully submitted,



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